

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)
)
 v.)) CRIMINAL NO. 1:04-cr-385
)
 ALI AL-TIMIMI,)
)
 Defendant.)

Government's First Proffer to Supplement the Record as to the Defendant's Emergency Motion for Bail Pending Appeal

In light of new factual developments, the government makes the following proffer to the Court and to defense counsel:

- On July 17, 2020, the undersigned learned from counsel at the Bureau of Prisons and the U.S. Attorney's Office for the District of Colorado that a staff member who works at the Federal Correctional Institution at FCC Florence has tested positive for COVID-19.
- The staffer in question was last present at FCC Florence on July 16, 2020.
- The staff member works at FCI Florence, which, while within the FCC Florence complex, is separate from the ADX facility where the defendant is housed.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: /s/

Daniel T. Young
John T. Gibbs
Gordon D. Kromberg
Assistant United States Attorneys
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, Virginia 22314
Office: (703) 299-3700
Fax: (703) 299-3980
Email: daniel.young@usdoj.gov
john.gibbs@usdoj.gov
gordon.kromberg@usdoj.gov

Certificate of Service

I certify that July 17, 2020, I electronically filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

By: _____ /s/

Daniel T. Young
Assistant United States Attorney
United States Attorney's Office
2100 Jamieson Avenue
Alexandria, Virginia 22314
Office: (703) 299-3700
Fax: (703) 299-3980
Email: daniel.young@usdoj.gov